

## AFFIDAVIT OF ALBERT DALLAS

1. I, Albert (Buddy) Dallas, am not a party to any of the actions outstanding by Jacquelyne Hollander (hereafter referred to as "Hollander") against the estate of James Brown (hereafter referred to as "Mr. Brown"), The Irrevocable Trust Established by James Brown in August 1, 2000, or the Attorney General for the State of South Carolina. I have no personal or pecuniary interest in any of her cases nor was I promised anything for my testimony herein. I hereby attest and swear under oath as follows from my personal knowledge of the facts herein:

2. I was Mr. Brown's personal legal counsel and friend from 1984 through his death on December 25, 2006. I was his confidante available to Mr. Brown any hour of every day about difficulties experienced by Mr. Brown and those he cared about. I represented Mr. Brown in many personal and legal matters throughout this period.

3. In or about 1985 or 1986 Hollander telephoned me and inquired about Mr. Brown's availability to record a song for the Atlanta Falcons football team that she had written. I advised her that I did not have any influence about what songs Mr. Brown would record, but that if she sent me a photograph and recording of the song I would present it to him and that if he was interested, Mr. Brown would contact her directly.

4. Mr. Brown did contact Hollander in or about 1986 and agreed to record the song. Mr. Brown contacted Scotti Brothers Records, Inc., a subsidiary of Columbia Broadcasting in order to get their permission to record the song and waive their publishing rights in it.

5. A date for the recording was set in or about August of 1986. I was present at that recording session. Hollander made a very positive impression on Mr. Brown. She was a talented singer/songwriter and used her talents to promote charitable benefits. Mr. Brown wanted to be involved in Hollander's projects and felt that this would also help his reputation in the community as he had not previously engaged in any meaningful charitable events. At the end of the recording session, Hollander and Mr. Brown agreed to become partners. I personally witnessed the oral partnership agreement. Attached as Exhibit "1" is a picture of Mr. Brown and Hollander shaking hands to seal that agreement.

6. Despite Mr. Brown's notoriety, at that point in his career he did not have a lot of money. He owed many people considerable sums of money and was under significant debt to the Internal Revenue Service.

7. From in or about 1986 through 1987 Hollander and Mr. Brown together performed many charitable activities for underprivileged children. They visited hospitals, visited underprivileged children directly and granted wishes for needy children. Hollander's boundless energy found the causes and organized the activities. Mr. Brown focused significant time and energy also as he was able to be part of those activities. Both Mr. Brown and Hollander contributed financial and other resources to the partnership.



8. In 1987 the Atlanta Falcons asked Mr. Brown and Hollander to perform at their halftime show wherein they released the recording of "Atlanta Be Rockin'" for charity. While in Atlanta, after visiting the Atlanta Falcon's Training Camp, Mr. Brown, Hollander and I went to Scottish Rites Hospital in Atlanta and Mr. Brown, in the presence of myself, Hollander, Dr. Nathan Hawke and the press, stated that he was leaving his wealth to needy and underprivileged children and that he would be working together with Hollander in that endeavor. Hollander came up with the name "The I Feel Good Trust" for their partnership.

9. I did not reduce the trust to writing for them because they were more interested in actively raising money for charities and individuals, particularly underprivileged children. Hollander became part of Mr. Brown's "inner circle" and in all ways was Mr. Brown's social conscience and she also became a very close friend of Mr. Brown's wife, Adrienne. Hollander organized benefits for The Leukemia Foundation and other individuals and charities.

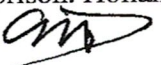
10. Mr. Brown also wanted to manage Hollander's songwriting and singing careers. Hollander also helped Mr. Brown in music production and in press relations. They did other projects such as advertising jingles.

11. In 1988 as part of a plea bargain in the Criminal Circuit Court of South Carolina, Hollander agreed to help Mr. Brown hold a benefit for the Fraternal Order of Police. This agreement, made as an apology for all of the trouble that Mr. Brown previously caused the South Carolina authorities, allowed Mr. Brown to shave years of prison time off of his sentence. The result was a benefit called Wrestlerock to be held in Augusta, Georgia. Mr. Brown encountered racial resistance to the use of the Augusta Civic Center from their then manager who advised Hollander and me that he didn't want that damn nigger in his building. Ironically, that same venue now bears Mr. Brown's name.

12. Hollander did an exemplary job with that benefit under very adverse conditions. The Georgia police did not support the reduced sentence that Mr. Brown received and they boycotted the benefit. Regardless, Hollander made the event work despite significant threats of personal injury. The event cost Mr. Brown in excess of seventy thousand dollars out of his pocket. As a direct result of the benefit Mr. Brown received no jail time in South Carolina for those charges.

13. Before that event Hollander met a terminally ill girl named Katina Bryant (hereafter referred to as "Katina"). Katina attended the Wrestlerock event and met Mr. Brown. Katina touched Mr. Brown very deeply, and Mr. Brown insisted that the "I Feel Good" partnership between he and Hollander focus on helping Katina in her remaining days on earth. Mr. Brown took an advisory role and Hollander wrote a song that was recorded by Katina as was her wish.

14. Mr. Brown was sentenced to prison in December 12, 1988 for an unrelated charge. Hollander continued to actively work for Katina and on other charitable endeavors even after Mr. Brown went to prison. Hollander later moved to Illinois.



15. In 1991 when Mr. Brown came out of prison his career became more lucrative than it had ever been. He made over one million dollars with his first concert. Yet Mr. Brown never forgot his partnership with Hollander and what it meant to needy and underprivileged children. Although estranged, Mr. Brown continued to be inspired by his relationship with Hollander and by the memory of Katina. They inspired him to help all needy and underprivileged children.

16. Mr. Brown never ceased talking about educating needy and underprivileged children. When the Georgia Educational Lotto commercials would come on television Mr. Brown would pause and say, "Mr. Dallas, that's what we're going to be doing." Mr. Brown never abandoned the original purpose of the trust announced at the Scottish Rites Hospital in Atlanta.

17. In 1999 I consulted, at Mr. Brown's request, with Hollander in Illinois about releasing the "Atlanta Be Rockin'" song again for the Atlanta Falcons. Mr. Brown would not have acted without Hollander's permission because it was a partnership asset.

18. In 1999 Mr. Brown contacted other counsel to set up a written trust that he named "The I Feel Good Trust" to continue the partnership's work for needy and underprivileged children. The first trust that he established in 1999 was restrictive in its insistence on specific educational institutions. Finally, a less restrictive trust was drafted and executed on August 1, 2000 (hereafter referred to as "the Trust"). I was named as one of three trustees in the final 2000 Trust. Mr. Brown left all of his intellectual property, rights to his likeness, and his residential home to fund the Trust.

19. In my opinion Mr. Brown looked at the August 1, 2000 Trust as an extension and fulfillment of, the partnership that he had with Hollander. The fact that he named that portion of the Trust "The I Feel Good Trust" was not a coincidence.

20. Affiant is over 18 years of age and is competent to testify to the above facts in a court of law and will do so if called upon to do so.

FURTHER AFFIANT SAYETH NAUGHT

  
Albert Dallas

7-31-12  
Date

SUBSCRIBED AND SWORN to  
before me this 31<sup>st</sup> day of July, 2012

Breanna Gilmer  
NOTARY PUBLIC

